

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,)	
)	
Plaintiffs,)	
)	
v.)	C. A. No. 05-823-***
)	
STANLEY TAYLOR, et al.,)	JURY TRIAL REQUESTED
)	
Defendants.)	

DEFENDANTS' MOTION FOR LEAVE TO DEPOSE PLAINTIFF

COME NOW Defendants Stanley Taylor, Joyce Talley, Tony Figario, Carl Anson, Michael Knight, Chris Senato, Joseph Atkins, Debbie Melvin, Richard Cockett, Richard Manuel, Wenston White, Steven Raynor, and Bethany Evans (collectively, "Defendants"), by and through their undersigned counsel, and respectfully move this Honorable Court to enter an Order granting Defendants' counsel the right to depose Plaintiff Vernon Truitt ("Plaintiff Truitt"), an incarcerated individual:

1. Plaintiff Truitt is an inmate incarcerated at the Sussex Correctional Institution in Georgetown, Delaware.
2. Counsel for the Defendants wishes to depose Plaintiff Truitt as part of discovery in this case.
3. The discovery deadline in this matter is April 1, 2008.
4. Fed. R. Civ. P. 30(a)(2) requires leave of the Court to depose an incarcerated individual.
5. A form of order is attached to this Motion that grants Defendants' counsel the right to depose Plaintiff Truitt.

WHEREFORE, Defendants respectfully request that this Honorable Court grant their Motion for Leave to Depose Plaintiff Vernon Truitt.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

/s/ Catherine Damavandi
Catherine Damavandi (ID # 3823)
Deputy Attorney General
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Attorney for State Defendants

DATE: November 28, 2007

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7.1.1 CERTIFICATE OF COUNSEL

Undersigned counsel hereby certify, pursuant to Local Rule 7.1.1, that:

1. Plaintiff Vernon Truitt is currently incarcerated and it is not practical for undersigned counsel to communicate with him concerning Defendants' Motion for Leave to Depose Plaintiff.
2. Therefore, undersigned counsel assumes that the Motion is opposed.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

/s/ Catherine Damavandi
Catherine Damavandi (ID # 3823)
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CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2007, I electronically filed *Defendants' Motion For Leave to Depose Plaintiff Vernon Truitt* with the Clerk of Court using CM/ECF. I hereby certify that on November 28, 2007, I have mailed by United States Postal Service, the document to the non-registered parties on the attached list.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

/s/ Catherine Damavandi
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